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Attorneys for Defendants

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MARC HIRSCHFELD,

Plaintiff,

v.

MARY C. BECKERLE, D. SCOTT DAVIS, IAN  
E.L. DAVIS, JENNIFER A. DOUDNA, ALEX  
GORSKY, MARK B. McCLELLAN, ANNE M.  
MULCAHY, WILLIAM D. PEREZ, CHARLES  
PRINCE, A. EUGENE WASHINGTON,  
RONALD A. WILLIAMS,

Defendants,

and

JOHNSON & JOHNSON,

Nominal Defendant.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CIVIL ACTION NO. 3:18-CV-14796  
(FLW)(DEA)

Hon. Freda L. Wolfson, U.S.D.J.  
Hon. Douglas E. Arpert, U.S.M.J.

**DEFENDANTS'  
NOTICE OF MOTION TO DISMISS  
COMPLAINT**

PLEASE TAKE NOTICE that on March 18, 2019 at 10:00 am, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants Mary C. Beckerle, D. Scott Davis, Ian E.L. Davis, Jennifer A. Doudna, Alex Gorsky, Mark B. McClellan, Anne M. Mulcahy, William D. Perez, Charles Prince, A. Eugene Washington, and Ronald A. Williams shall move before the Hon. Freda L. Wolfson, U.S.D.J., United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order dismissing the Complaint against Defendants with prejudice, and for such other and further relief as the Court deems equitable and appropriate.

PLEASE TAKE FURTHER NOTICE that Defendants shall rely upon the accompanying letter brief, which adopts and joins the arguments made by Nominal Defendant Johnson & Johnson in support of its Motion to Dismiss, as well as all papers on file in this action. A proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: February 20, 2019

Respectfully Submitted,

Erik Haas  
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/s/ Edwin F. Chociey Jr.  
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